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9
10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 DONALD WALDEN JR., NATHAN
13 ECHEVERRIA, AARON DICUS, BRENT
EVERIST, TRAVIS ZUFELT, TIMOTHY
RIDENOUR, and DANIEL TRACY on behalf
of themselves and all others similarly situated,

14 Plaintiffs,

15 vs.

16 THE STATE OF NEVADA, EX REL. ITS
17 NEVADA DEPARTMENT OF
CORRECTION, and DOES 1-50,

18 Defendants.
19

Case No. 3:14-cv-00320-MMD-WGC

**STIPULATION AND ORDER TO EXTEND
THE DEADLINE FOR (1) FILING
DISPOSITIVE MOTIONS AND (2) FILING
AN OPPOSITION BRIEF TO
PLAINTIFFS' MOTION FOR PARTIAL
SUMMARY JUDGMENT ON LIABILITY
FOR UNPAID WAGES UNDER THE FLSA
(FIRST REQUEST)**

20 Defendant, the State of Nevada, Ex. Rel. Its Nevada Department of Corrections ("NDOC"),
21 and Plaintiffs Donald Walden Jr., Nathan Echeverria, Aaron Dicus, Brent Everist, Travis Zufelt,
22 Timothy Ridenour, and Daniel Tracy, on behalf of themselves and all others similarly situated
23 ("Plaintiffs"), by and through their respective counsel of record, hereby stipulate and agree to extend
24 the dispositive motion deadline by thirty days, from March 2, 2020 to **April 1, 2020**.

25 The parties also stipulate and agree to extend the deadline for NDOC to file a response to
26 Plaintiffs' Motion for Partial Summary Judgment on Liability for Unpaid Wages Under the FLSA
27 ("Motion") by two weeks, from March 16, 2020 to **March 30, 2020**.
28

1 This stipulation is submitted in compliance with LR IA 6-1. Good cause exists for the
2 requested extension as counsel for the NDOC experienced a Firm wide system crash which resulted
3 in having no access to the document management system which holds all relevant file materials and
4 information necessary to respond to Plaintiffs' Motion. Accordingly, the parties agree that the
5 requested extension furthers the interest of this litigation and is not being requested in bad faith or
6 to delay these proceedings unnecessarily.

7 This is the parties' first request for extension of these deadlines.

8 DATED this 26th day of February, 2020.

9 **WILSON, ELSER, MOSKOWITZ,**
10 **EDELMAN & DICKER LLP**

11 /s/ James T. Tucker

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300 South Fourth Street, 11th Floor
Las Vegas, Nevada 89101
Attorneys for Defendant

15 DATED this 26th day of February, 2020.

16 **THIERMAN BUCK LLP**

17 /s/ Leah L. Jones

18 Mark R. Thierman, Esq., Nevada Bar No. 8285
19 Joshua D. Buck, Esq., Nevada Bar No. 12187
20 Leah L. Jones, Esq., Nevada Bar No. 13161
7287 Lakeside Drive
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Attorneys for Plaintiffs

21 **ORDER**

22 **GOOD CAUSE SHOWN, IT IS SO ORDERED.**

23 Dated this _____ day of _____, 2020.

24
25
26 UNITED STATES DISTRICT JUDGE